

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

*ex rel.* JAY MEYTHALER,

Plaintiff/Relator,

v.

DETROIT MEDICAL CENTER, INC., et al.

Defendants.

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Civil No. 5:15-cv-12333

Honorable Stephen J. Murphy, III  
Magistrate Judge David R. Grand

**FILED UNDER SEAL**  
**AND IN CAMERA**

**JOINT STIPULATION FOR DISMISSAL**

The United States of America and Relator Jay Meythaler, by their respective undersigned counsel, respectfully file this Joint Stipulation for Dismissal pursuant to Fed. R. Civ. P. 41(a)(1)(A), 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of a Settlement Agreement fully executed on or about May 24, 2023, by the United States, Relator, VHS of Michigan, Inc. d/b/a The Detroit Medical Center (“DMC”), Vanguard Health Systems, Inc. (“Vanguard”), and Tenet Healthcare Corporation (“Tenet”).

The United States and Relator stipulate as follows:

1. The United States and Relator have executed a written Settlement Agreement, in compromise and settlement of the United States and Relator's claims against DMC, Vanguard, and Tenet for the Covered Conduct as defined in the Settlement Agreement. This Stipulation of Dismissal is consistent with and subject to the terms of the Settlement Agreement.

2. Relator agrees that the amount and terms of the settlement are fair, adequate and reasonable under all the circumstances pursuant to 31 U.S.C. § 3730, *et seq.*, and otherwise.

3. The United States and Relator request, pursuant to Fed. R. Civ. P. 41(a)(1)(A), and 31 U.S.C. § 3730(b)(1), that all of the claims asserted by Relator in this action on behalf of the United States against DMC, Vanguard, and Tenet, which are based on the Covered Conduct as defined in Recital F of the Settlement Agreement, be dismissed with prejudice as to both the United States and Relator.

4. Relator requests, pursuant to Fed. R. Civ. P. 41(a)(1)(A), that the remaining claims asserted by Relator on behalf of the United States and against DMC, Vanguard, Tenet, and all other defendants in this matter, in which claims the United States has not intervened, be dismissed with prejudice to Relator and without prejudice to the United States. Pursuant to the False Claims Act, 31

U.S.C. 3730(b)(1), the United States hereby consents to Relator's voluntary dismissal of that portion of the case, provided such dismissal is without prejudice to the United States.

5. All parties shall bear their own fees, costs, and expenses, except as specified in Paragraph 3 of the Settlement Agreement.

6. A proposed order accompanies this Joint Stipulation for Dismissal.

Respectfully submitted,

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